

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

<p>IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</p> <p>-----</p> <p>This document applies to:</p> <p>ETHICON WAVE 4 CASES LISTED IN EXHIBIT A TO DEFENDANTS' WAVE 4 NOTICE OF ADOPTION</p>	<p>Master File No. 2:12-MD-02327 MDL 2327</p> <p>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</p>
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**NOTICE OF ADOPTION OF REPLY IN SUPPORT OF PRIOR DAUBERT MOTION TO  
EXCLUDE GENERAL-CAUSATION TESTIMONY OF  
NEERAJ KOHLI, M.D., M.B.A. FOR WAVE 4**

Defendants hereby adopt and incorporate by reference the Wave 3 Reply in Support of Motion to Exclude General-Causation Testimony of Neeraj Kohli, M.D., M.B.A., Dkt. 3023. Defendants respectfully request that the Court exclude Dr. Kohli's testimony, for the reasons expressed in the Wave 3 briefing. This notice applies to the Wave 4 cases identified in Exhibit A attached to Defendants' Wave 4 Notice of Adoption, Dkt. 3581.

Respectfully submitted,

ETHICON, INC., ETHICON, LLC, AND  
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**CERTIFICATE OF SERVICE**

I certify that on May 3, 2017, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

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